

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

Chapter 11

Bankr. Case No. 22-11068 (JTD)

(Jointly Administered)

Mohsin Y. Meghji, as Litigation Administrator for Celsius
Network LLC and its affiliated debtors, *et al.*,

Appellant,

-v.-

FTX Trading Ltd., *et al.*,

Appellee.

U.S. District Court

C.A. No. 25-cv-00002-TLA

**APPELLEE FTX RECOVERY TRUST’S COUNTER-DESIGNATION OF
ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Appellee, the FTX Recovery Trust¹, by and through its undersigned counsel, respectfully submits, pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure and Rule 8009-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, this counter-designation of items to be included in the record on appeal (the “Counter-Designation”) with respect to the appeal by Appellant Mohsin

¹ The FTX Recovery Trust was established through the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [Bankr. D.I. 26404], which became effective on January 3, 2025 [Bankr. D.I. 29127], pursuant to which all of the Debtors’ rights and interests in this appeal were transferred to the FTX Recovery Trust. Plan § 5.13; see also Confirmation Order ¶ 32. On January 28, 2025, Appellee filed a motion with the District Court to update the case caption and the name of Appellee to reflect the FTX Recovery Trust as the substituted party in interest, which is currently pending.

Y. Meghji, Litigation Administrator for Celsius Network LLC and its affiliated debtors (“Celsius”), from the *Memorandum Opinion and Order Sustaining Debtors’ Objection to Proofs of Claim and Denying Motion for Relief from the Automatic Stay* (the “Opinion and Order”) [Bankr. D.I. 28891] before the United State District Court for the District of Delaware (the “Appeal”). Pursuant to the Court’s standing order dated November 9, 2015, titled *Designations of Records in Bankruptcy Appeals*, Appellee hereby files this Counter-Designation with the District Court.

**COUNTER-DESIGNATION OF ITEMS TO BE
INCLUDED IN THE RECORD ON APPEAL**

1. Appellee counter-designates the following items to be included in the record on Appeal:

No.	Docket No.	Date	Description
1.	<i>In re Mallinckrodt Plc</i> , No. 20-12522 (Bankr. D. Del.), Doc. No. 3414	7/26/2021	July 23, 2021 Hearing Transcript
2.	<i>In re Celsius Network LLC</i> , No. 22-10964 (MG) (Bankr. S.D.N.Y.), Doc. No. 973	10/5/2022	<i>Global Notes and Statement of Limitations, Methodology and Disclaimers Regarding the Debtors’ Schedules of Assets and Liabilities and Statements of Financial Affairs</i> , and exhibits thereto
3.	<i>In re Voyager Digital Holdings, Inc.</i> , No. 22-10943 (MEW) (Bankr. S.D.N.Y.), Doc. No. 727	12/14/2022	<i>Motion of Celsius Network LLC for Order (I) Lifting the Automatic Stay Pursuant to 11 U.S.C. 362(d)(1) and Bankruptcy Rule 4001 and (II) Granting Leave to File Late Proof of Claim Pursuant to Bankruptcy Rules 3003(c) and 9006(b)(1)</i> , and exhibits thereto
4.	<i>In re Voyager Digital Holdings, Inc.</i> , No. 22-10943 (MEW) (Bankr. S.D.N.Y.), Doc. No. 789	12/23/2022	<i>Updated Motion of Celsius Network LLC for Order (I) Lifting the Automatic Stay Pursuant to 11 U.S.C. 362(d)(1) and Bankruptcy Rule 4001 and (II) Granting Leave to File Late Proof of Claim Pursuant to Bankruptcy Rules 3003(c) and 9006(b)(1)</i> , and exhibits thereto

No.	Docket No.	Date	Description
5.	<i>In re Voyager Digital Holdings, Inc.</i> , No. 22-10943 (MEW) (Bankr. S.D.N.Y.), Doc. No. 866	1/17/2023	<i>Objection of the Official Committee of Unsecured Creditors to Celsius Network LLC's Motion Seeking an Order (I) Lifting the Automatic Stay Pursuant to 11 U.S.C. 362(d)(1) and Bankruptcy Rule 4001 and (II) Granting Leave to File Late Proof of Claim Pursuant to Bankruptcy Rules 3003(c) and 9006(b)(1), and exhibits thereto</i>
6.	<i>In re Voyager Digital Holdings, Inc.</i> , No. 22-10943 (MEW) (Bankr. S.D.N.Y.), Doc. No. 867	1/17/2023	<i>Debtors' Objection to Motion of Celsius Network LLC for Order (I) Lifting the Automatic Stay Pursuant to 11 U.S.C. 362(d)(1) and Bankruptcy Rule 4001 and (II) Granting Leave to File Late Proof of Claim Pursuant to Bankruptcy Rules 3003(c) and 9006(b)(1), and exhibits thereto</i>
7.	<i>In re Voyager Digital Holdings, Inc.</i> , No. 22-10943 (MEW) (Bankr. S.D.N.Y.), Doc. No. 893	1/22/2023	<i>Omnibus Reply of Celsius Network Limited in Support of Its Motion for Order (I) Lifting the Automatic Stay Pursuant to 11 U.S.C. 362(d)(1) and Bankruptcy Rule 4001 and (II) Granting Leave to File Late Proof of Claim Pursuant to Bankruptcy Rules 3003(c) and 9006(b)(1), and exhibits thereto</i>
8.	<i>In re Voyager Digital Holdings, Inc.</i> , No. 22-10943 (MEW) (Bankr. S.D.N.Y.), Doc. No. 921	1/30/2023	January 24, 2023 Hearing Transcript
9.	<i>In re Voyager Digital Holdings, Inc.</i> , No. 22-10943 (MEW) (Bankr. S.D.N.Y.), Doc. No. 1012	2/17/2023	<i>Order Denying Motion by Celsius Network LLC Lifting the Automatic Stay and Extending Time to File Proof of Claim After Claims Bar Date</i>
10.	<i>In re Celsius Network LLC</i> , No. 22-10964 (MG) (Bankr. S.D.N.Y.), Doc. No. 2311	3/24/2023	<i>Notice of Filing of Amended Global Notes, Statement of Financial Affairs 3 and 4, and Schedule F, and exhibits thereto</i>
11.	<i>Meghji v. Wolfgang</i> , Adv. Proc. No. 24-02091 (Bankr. S.D.N.Y.), Doc. No. 1	7/3/2024	<i>Complaint Filed by Mohsin Y. Meghji, Litigation Administrator for Celsius Network LLC and its Affiliated Debtors Against Richard Francis Wolfgang²</i>

² In July 2024, Celsius filed thousands of avoidance action complaints against certain of its customers. Those complaints are substantively identical and were later consolidated into

No.	Docket No.	Date	Description
12.	20291	7/12/2024	<i>The Official Committee of Unsecured Creditors' Joinder to the Debtors' Objection to the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay</i>
13.	20292	7/12/2024	<i>The Official Committee of Unsecured Creditors' Joinder to the Debtors' Objection to Proofs of Claim Filed By Celsius Network LLC and Its Affiliated Debtors</i>
14.	24587	9/12/2024	<i>Joint Witness and Exhibit Lists of the Celsius Litigation Administrator and the Debtors</i>
15.	26292	10/4/2024	<i>Joint Witness and Exhibit Lists of the Celsius Litigation Administrator and the Debtors</i>
16.	26404	10/8/2024	<i>Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates, and exhibits thereto</i>
17.	28102	11/20/2024	<i>Motion of Debtors for Entry of An Order Establishing the Amount of the Disputed Claims Reserve, and exhibits thereto</i>
18.	28582	12/5/2024	<i>Celsius Litigation Administrator's Limited Objection to the Motion of Debtors for Entry of An Order Establishing the Amount of the Disputed Claims Reserve</i>
19.	28642	12/9/2024	<i>Debtors' Reply in Support of the Motion of Debtors for Entry of An Order Establishing the Amount of the Disputed Claims Reserve</i>
20.	28661	12/10/2024	<i>Certification of Counsel Regarding Motion of Debtors for Entry of an Order Establishing the Amount of the Disputed Claims Reserve, and exhibits thereto</i>
21.	28689	12/11/2024	<i>Order Establishing the Amount of the Disputed Claims Reserve</i>
22.	29127	1/3/2025	<i>Notice of Effective Date of the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates</i>

a single docket, *In re: Celsius Customer Preference Actions*, Adv. Proc. No. 24-04024 (MG) (Bankr. S.D.N.Y.). Appellee is designating the complaint in *Meghji v. Wolfgang*, Adv. Proc. No. 24-02091 (Bankr. S.D.N.Y) as an example of the thousands of complaints Celsius filed.

RESERVATION OF RIGHTS

Appellee expressly reserves the right to supplement the record on Appeal and to adopt the designation of any items designated or counter-designated by any other appellant, cross-appellant, appellee, or cross-appellee to the Appeal from the Opinion and Order.

Dated: January 28, 2025
Wilmington, Delaware

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